

# **Chapter 10:**

## **What You Do Once You Are a PrintSTEP Participant**

### **If You Have a PrintSTEP Notification**

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- Every year you must go through this Workbook to determine your facility's releases and wastes. You must keep the annual update for your internal records, but you don't need to send it into the state if you still qualify for PrintSTEP Notification (i.e., your emissions have not increased enough to where you would need a PrintSTEP Agreement). Over the next year, you must operate your facility within the limits for each of the media categories you listed on your PrintSTEP application and follow all regulatory requirements.
- If you anticipate your emissions/releases/wastes to increase so you no longer qualify for a PrintSTEP Notification, you must submit a new PrintSTEP application to the state PrintSTEP contact before exceeding any limits. You must follow all public involvement, regulatory, and PrintSTEP requirements associated with the increased environmental emissions/wastes.
- Once per year, NHDES will send you a copy of your PrintSTEP Application. You will need to update this with any changes, and resubmit to the NHDES. This report must detail any changes made at the facility over the previous year.

### **If You Have a PrintSTEP Agreement**

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- When you get your PrintSTEP Agreement, it will describe your regulatory requirements for process waste water, hazardous waste, storm water, and air emissions.
- Your PrintSTEP Agreement is enforceable and you are required to run your business in a way that is consistent with the requirements in the Agreement.
- Once a year, you will submit a PrintSTEP Annual report describing your facility's emissions and wastes to the state agency. This report must also detail all of the modifications made at the facility over the previous year.
- Once per year, NHDES will send you a copy of your PrintSTEP Application. You will need to update this with any changes, and resubmit to the NHDES. This report must detail any changes made at the facility over the previous year.

## What if I Make Modifications

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- One of the advantages of PrintSTEP is that it enables you to make modifications which could lead to an increase in emissions or wastes without necessarily requiring approval from the state. For example, modifications could include process changes, equipment changes, material additions or substitutions, or production increases or decreases. A description of the modifications must be included in your annual PrintSTEP application submitted to the NHDES. The following section applies to all PrintSTEP printers and describes what printers are required to do when making modifications.

### **Modifications that affect waste water, hazardous waste, or storm water, but do not change your regulatory category for these media**

- If you make modifications in your operations (other than adding a new printing process or new pollution control equipment) that do not result in any change in your regulatory categories for waste water, hazardous waste, or storm water, there is no need to notify the state PrintSTEP contact. For example, if production increases result in an increase in hazardous waste generation, but you are still a “small quantity generator,” you do not need to notify the state.
- For modifications within regulatory categories for these waste streams, you must follow the current regulatory procedures. Thus, PrintSTEP simply incorporates the existing modification requirements for these media.
- A description of the modification must be included in your annual report.

### **Modifications that affect air emissions, but do not change the facility’s Air Levels (VOC, RTAP, HAP)**

- Under the PrintSTEP pilot, if you make modifications that do not increase your emissions, in most cases **you do not need to notify the NHDES** to proceed.
  - If you are in VOC Level 1, 2, 3, or 4, you can make modifications that change your VOC emissions, provided that the modifications **do not increase** your PrintSTEP VOC Level to the next highest Level.
  - If your RTAP Level remains 1 (no permit required), no notification is required.
  - If you are in HAP Level 1 or 2, you can make modifications that change your HAP emissions, provided that the modifications do not increase you to HAP Level 3.
- When state notification or approval is not required at the time of the modification, if you are in Air Levels 2, 3, or 4, you must describe the change in the your annual report.
- If you are in Air Level 5, the state will include the process for making modifications in the printer’s PrintSTEP Agreement. Your annual report must describe any modifications that resulted in an emission increase at the facility during the year.

### **Modifications that result in a higher regulatory category**

- For any waste stream, if you intend to make modifications (including production increases) that could increase wastes or emissions, thereby putting the facility in a higher regulatory category, you must notify the state PrintSTEP contact.
- The printer must submit a new PrintSTEP application at the higher Level as soon as they anticipate the increase, *before* the increase occurs.
- Printers in Air Levels 1 and 2 are not required to track emissions data monthly; however, PrintSTEP air emission limits for *all* Air Levels are enforceable. Printers must look ahead to make sure they're not exceeding the Air Level's threshold. If printers go over the threshold for their Air Level, it's up to the state to decide on an enforcement action.
- If the modifications move the facility to a category that requires public involvement, then the public will be involved in the modification process. While the public will have access to the complete PrintSTEP Agreement, they can only comment on the part of the Agreement that is being changed.

### **Modifications that result in a lower regulatory category**

- For any waste stream, if you make modifications (including production decreases) that decrease wastes or emissions, thereby putting the facility in a lower regulatory category, you can resubmit a PrintSTEP application and get your regulatory requirements reduced.
- Applications for a lower regulatory category must be based on a full year of data. After one year of data, you can submit a new application.

### **Adding a new printing process or a new type of pollution control equipment**

- If a you plan to add a new type of pollution control equipment or a printing process that is new to the facility, you must fill out revised PrintSTEP application and submit it to the NHDES PrintSTEP contact only if one of the following apply:
  - Your VOC Level is 3, 4, or 5
  - Your RTAP level is above the de minimus levels (see Chapter 7)
  - Your HAP level is 2 or 3
- The revised PrintSTEP application should describe the new process or equipment.
- The NHDES will review the information and send you an updated PrintSTEP Notification or Agreement.
- The NHDES will add this information to Information Repository.

## Technical Assistance

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Technical Assistance is available, free of charge, for all PrintSTEP Program participants. Technical Assistance specialists can help you, one-on-one, in your facility. Take advantage of this valuable resource!

- They can work with you to identify opportunities for pollution prevention.
- They can help you with your PrintSTEP application.
- They offer compliance assistance.
- They can also guide you in the right direction to make these recommendations happen.
- See Appendix A for contact information.